EXHIBIT G

SCHEDULE B

Plaintiff Sonos, Inc. ("Sonos") commands Spotify USA Inc. ("Spotify") to appear on September 24, 2021, at 9:00am (or as agreed upon) to testify at a deposition to be taken at the offices of Sonos's counsel, Orrick, Herrington & Sutcliffe LLP, 51 W 52nd St., New York, NY 10019 (or as agreed upon). Sonos reserves the right to postpone the date and time of the deposition if Spotify has not produced, by September 10, 2021, at 5:00pm (or as agreed upon), the documents and things requested in Schedule A of the Subpoena to Produce Documents served herewith. The subject matter of the deposition will include the following topics.

DEFINITIONS AND INSTRUCTIONS

For purposes of responding to this deposition request, the following definitions and instructions shall apply:

1.   The term "Spotify" shall mean Spotify USA Inc., any company name under which Spotify is doing business; and its predecessors, parents, subsidiaries, divisions, licensees, franchisees, assigns or other related business entities, as well as directors, officers, employees, agents, distributors, jobbers, salespersons, sales representatives, and each person acting or purporting to act on its or their behalf or under its or their control, including but not limited to any observers, stringers, and/or reporters working for or with Spotify.

2.   The term and "Sonos" shall mean Sonos, Inc., any predecessor, successor, parent, subsidiary, or affiliate, and where applicable, Sonos's officers, directors, employees, partners, agents, attorneys, or any other person or business entity acting or purporting to act on Sonos's behalf.

3.   The term "Google," shall mean Google LLC, and any other name under which Google LLC is doing or has done business, any predecessor, successor, parent, subsidiary, or

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affiliate, and where applicable, Google's officers, directors, employees, partners, agents, attorneys, or any other person or business entity acting or purporting to act on Google's behalf.

4.   The terms "document," "documents," and "information" each incorporates all documents, electronically stored information (ESI), and things as broadly defined in Rule 34 of the Federal Rules of Civil Procedure and related case law.

5.   The terms "communication" and "communications" shall mean all exchanges or transmittals, whether in paper, electronic, oral or any other form or medium, of information (including but not limited to transmittals of facts, ideas, inquiries, analyses, assertions, concerns, instructions, opinions, reservations, thoughts or otherwise) by any mode of transmission, including e-mail, facsimile, telex, courier, U.S. mail, in person, telephone, cell phone and other internet-based, wireless-based, and satellite-based modes of transmission, between or among two or more persons and includes all documents and things constituting, relating to, incorporating, including, summarizing, describing or identifying the contents, subject matter, date, place and time of or participants in an exchange or transmittal.

6.   The terms "person" and "persons" shall mean any natural person.

7.   The terms "entity" and "entities" shall mean any business, legal or governmental entity or association.

8.   The terms "and," "or," and "and/or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of the request all responses that otherwise might be construed to be outside its scope.

9.   The terms "all," "any," "each," and "every" shall be construed as encompassing any and all.

10.   The terms "including" and "include" shall be construed in such a way as to suggest

or provide an example or examples. The terms "including" and "include" shall not be construed in such a way as to limit or confine the broader term or concept for which a suggestion or example is being given.

11.   Each of "relating to," "relate to," "referring to," "refer to," "regarding," "with regard to," "concern," "concerning" and derivatives thereof shall be construed broadly so as to encompass the liberal scope of discovery set forth in Rule 26(b) of the Federal Rules of Civil Procedure and shall mean directly or indirectly affecting, alluding to, analyzing, bearing upon, commenting on, comparing, complementing, comprising, concerning, constituting, containing, contemplating, contradicting, criticizing, critiquing, dealing with, depicting, describing, discussing, embodying, evaluating, evidencing, identifying, incorporating, involving, mentioning, negating, noting, pertaining to, providing a basis for, referencing, referring to, reflecting, refuting, regarding, relating to, respecting, responding to, reviewing, stating, summarizing, supporting, with respect to or otherwise in any manner pertaining to or being connected to, whether logically, circumstantially, factually, legally, directly or indirectly, the document, thing, information, matter, topic, issue, fact, assertion, allegation or circumstance being stated, discussed or referenced.

12.   The use of the singular form of any word includes the plural and *vice versa* to bring within the scope of the request all responses that otherwise might be construed to be outside its scope.

13.   The term "how" shall be construed as how, what, why, when, who, and/or where as necessary to bring within the scope of the request all responses that otherwise might be construed to be outside its scope.

14.   The term "date" shall mean the exact day, month, and year (to the degree ascertainable) or if not ascertainable, the best approximation (including relationship to other

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events).

15.   The term "the '206 Patent" shall mean U.S. Patent No. 9,344,206, as well as its application and any publications thereof.

16.   The term "the '615 Patent" shall mean U.S. Patent No. 9,967,615, as well as its application and any publications thereof.

17.   The term "the '966 Patent" shall mean U.S. Patent No. 10,469,966, as well as its application and any publications thereof.

18.   The term "the '033 Patent" shall mean U.S. Patent No. 10,779,033, as well as its application and any publications thereof.

19.   The term "the '885 Patent" shall mean U.S. Patent No. 10,848,885, as well as its application and any publications thereof.

20.   The term "Patent(s)-in-Suit" shall mean the '206 Patent, the '615 Patent, the '966 Patent, the '033 Patent, and the '885 Patent, either collectively or individually.

21.   The term "customer(s)" shall mean any purchaser, reseller, distributor, dealer, retailer, wholesaler, user, and/or recipient.

22.   The term "knowledge" shall include firsthand information and information derived from any source, including hearsay knowledge.

23.   The term "Google Media Player(s)" shall mean the following products, including any and all versions thereof, either collectively or individually: CHROMECAST, CHROMECAST ULTRA, CHROMECAST AUDIO, CHROMECAST WITH GOOGLE TV, HOME MINI, NEST MINI, HOME, HOME MAX, NEST AUDIO, HOME HUB, NEST HUB, NEST HUB MAX, and NEST WIFI POINT.

24.   The term "Google Display(s)" shall mean the following products, including any

and all versions thereof, either collectively or individually: HOME HUB, NEST HUB, and NEST

HUB MAX.

25.   The term "Pixel Device(s)" shall mean the following products, including any and

all versions thereof, either collectively or individually: PIXEL, PIXEL XL, PIXEL 2, PIXEL 2

XL, PIXEL 3, PIXEL 3 XL, PIXEL 3A, PIXEL 3A XL, PIXEL 4, PIXEL 4 XL, PIXEL 4A,

PIXEL 4A (5G), PIXEL 5, PIXEL SLATE, PIXELBOOK, PIXELBOOK GO.

26.   The term "Google Product(s)" shall mean any Google Media Player(s), Pixel

Device(s), and/or Google Display(s).

27.   The term "Google Server(s)" shall mean any Google server that hosts the Spotify

app for download, any Google server that facilitates moving or transferring playback of Spotify

from a computing device running the Spotify app to a Google Media Player (e.g., by virtue of the

"Spotify Connect"[1] or Google "Cast"[2] feature), and any Google server that, in response to user

input at the Spotify app, facilitates delivering Spotify media to a Google Media Player (including

but not limited to any Cloud Content Delivery Network (CDN) server), either collectively or

individually.

28.   The term "Spotify Server(s)" shall mean any server that facilitates playback of

Spotify by a computing device or Google Media Player, any server that facilitates moving or

transferring playback of Spotify from a computing device running the Spotify app to a Google

Media Player (e.g., by virtue of the "Spotify Connect"[3] or Google "Cast"[4] feature), and any server

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[1] *See, e.g.*, https://developer.spotify.com/use-cases/hardware/home-audio/.
[2] *See, e.g.*, https://techcrunch.com/2015/09/29/spotify-comes-to-google-chromecast-and-chromecast-audio/.
[3] *See, e.g.*, https://developer.spotify.com/use-cases/hardware/home-audio/.
[4] *See, e.g.*, https://techcrunch.com/2015/09/29/spotify-comes-to-google-chromecast-and-chromecast-audio/.

that, in response to user input at the Spotify app, facilitates delivering Spotify media to a computing device or Google Media Player, either collectively or individually.

29.   No topic or subpart hereof shall be construed as a limitation on any other topic or subpart hereof.

30.   When objecting to any topic, please state with specificity the grounds for each objection and the topic or subpart to which each objection applies.

DEPOSITION TOPICS

TOPIC NO. 1

How the Spotify app, running on a computing device (e.g., Pixel Device or other mobile phone, tablet, laptop, etc.), independently or working with other software on the computing device, enables a user to move or transfer playback of Spotify content from the computing device to a Google Media Player (e.g., by virtue of the "Spotify Connect"[5] or Google "Cast"[6] feature), including but not limited to (i) describing in detail any information that is exchanged between the computing device, the Google Media Player, any Spotify Server, and/or any third-party server (e.g., Google Server, such as the Google Cloud Platform[7]) to facilitate the aforementioned functionality and how such exchange takes place, (ii) describing in detail any creation, existence, modification, or deletion of any "queue"[8] of one or more media items to facilitate the aforementioned functionality and how such creation, existence, modification, or deletion takes

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[5] *See, e.g.*, https://developer.spotify.com/use-cases/hardware/home-audio/.
[6] *See, e.g.*, https://techcrunch.com/2015/09/29/spotify-comes-to-google-chromecast-and-chromecast-audio/.
[7] *See, e.g.*, https://engineering.atspotify.com/2019/12/09/views-from-the-cloud-a-history-of-spotifys-journey-to-the-cloud-part-1-2/.
[8] *See, e.g.*, https://support.spotify.com/us/article/play-queue/.

place, and (iii) the circumstances surrounding how and when the Spotify app was modified to

facilitate the aforementioned functionality.

TOPIC NO. 2

How the Spotify app, running on a Google Display, independently or working with other

software on the Google Display, enables a user to move or transfer playback of Spotify content

from the Google Display to one or more other Google Media Players (e.g., by virtue of the "Spotify

Connect"[9] or Google "Cast"[10] feature), including but not limited to (i) describing in detail any

information that is exchanged between the Google Display, the Google Media Player(s), any

Spotify Server, and/or any third-party server (e.g., a Google Server, such as the Google Cloud

Platform[11]) to facilitate the aforementioned functionality and how such exchange takes place, (ii)

describing in detail any creation, existence, modification, or deletion of any "queue"[12] of one or

more media items to facilitate the aforementioned functionality and how such creation, existence,

modification, or deletion takes place, and (iii) the circumstances surrounding how and when the

Spotify app was modified to facilitate the aforementioned functionality.

TOPIC NO. 3

How the Spotify app, running on a computing device (e.g., Pixel Device or other mobile

phone, tablet, laptop, etc.), independently or working with other software on the computing device,

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[9] *See, e.g.*, https://developer.spotify.com/use-cases/hardware/home-audio/.
[10] *See, e.g.*, https://techcrunch.com/2015/09/29/spotify-comes-to-google-chromecast-and-chromecast-audio/.
[11] *See, e.g.*, https://engineering.atspotify.com/2019/12/09/views-from-the-cloud-a-history-of-spotifys-journey-to-the-cloud-part-1-2/.
[12] *See, e.g.*, https://support.spotify.com/us/article/play-queue/.

transitions the computing device from locally playing Spotify content to controlling[13] playback of the Spotify content by a Google Media Player after moving or transferring playback of the Spotify content from the computing device to the Google Media Player (e.g., by virtue of the "Spotify Connect"[14] or Google "Cast"[15] feature), including but not limited to describing in detail how the computing device determines to make such a transition and how such determination takes place.

TOPIC NO. 4

How the Spotify app, running on a Google Display, independently or working with other software on the Google Display, transitions the Google Display from locally playing Spotify content to controlling[16] playback of the Spotify content by one or more other Google Media Players after moving or transferring playback of the Spotify content from the computing device to the one or more other Google Media Players (e.g., by virtue of the "Spotify Connect"[17] or Google "Cast"[18] feature), including but not limited to describing in detail how the Google Display determines to make such a transition and how such determination takes place.

TOPIC NO. 5

How the Spotify service enables a Google Product (e.g., a Google Media Player or Pixel

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[13] *See, e.g.*, https://www.spotify.com/us/connect/ ("Listen on your speakers or TV, using the Spotify app as a remote").
[14] *See, e.g.*, https://developer.spotify.com/use-cases/hardware/home-audio/.
[15] *See, e.g.*, https://techcrunch.com/2015/09/29/spotify-comes-to-google-chromecast-and-chromecast-audio/.
[16] *See, e.g.*, https://www.spotify.com/us/connect/ ("Listen on your speakers or TV, using the Spotify app as a remote").
[17] *See, e.g.*, https://developer.spotify.com/use-cases/hardware/home-audio/.
[18] *See, e.g.*, https://techcrunch.com/2015/09/29/spotify-comes-to-google-chromecast-and-chromecast-audio/.

Device) to receive and then play back a sequence of media items (e.g., songs, podcast episodes, etc.), including but not limited to (i) describing in detail any communications between the Google Product and any web server (e.g., a Google Server, such as the Google Cloud Platform[19], or a Spotify Server) and how such communications take place, (ii) describing in detail any communications between one or more web servers (e.g., a Google Server, such as the Google Cloud Platform[20], or a Spotify Server) and how such communications take place, and (iii) describing in detail how any web server (e.g., Google and/or Spotify Servers) creates, updates, manages, or hosts a set of one or more media items that are scheduled for playback by the Google Product and how such creating, updating, managing, or hosting occurs.

TOPIC NO. 6

How the Spotify service enables a Google Display to receive and then play back a sequence of media items (e.g., songs, podcast episodes, etc.), including but not limited to (i) describing in detail any communications between the Google Display and any web server (e.g., a Google Server, such as the Google Cloud Platform[21], or a Spotify Server) and how such communications take place, (ii) describing in detail any communications between one or more web servers (e.g., a Google Server, such as the Google Cloud Platform[22], or a Spotify Server) and how such communications take place, and (iii) describing in detail how any web server (e.g., Google and/or

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[19] *See, e.g.*, https://engineering.atspotify.com/2019/12/09/views-from-the-cloud-a-history-of-spotifys-journey-to-the-cloud-part-1-2/.

[20] *See, e.g.*, https://engineering.atspotify.com/2019/12/09/views-from-the-cloud-a-history-of-spotifys-journey-to-the-cloud-part-1-2/.

[21] *See, e.g.*, https://engineering.atspotify.com/2019/12/09/views-from-the-cloud-a-history-of-spotifys-journey-to-the-cloud-part-1-2/.

[22] *See, e.g.*, https://engineering.atspotify.com/2019/12/09/views-from-the-cloud-a-history-of-spotifys-journey-to-the-cloud-part-1-2/.

Spotify Servers) creates, updates, manages, or hosts a set of one or more media items that are scheduled for playback by the Google Product and how such creating, updating, managing, or hosting occurs.

TOPIC NO. 5

The extent to which Spotify employees have used (e.g., by testing or demonstrating) the Spotify app running on a computing device (e.g., Pixel Device or other mobile phone, tablet, laptop, etc.) to move or transfer playback of Spotify content from the computing device to a Google Media Player (e.g., by virtue of the "Spotify Connect"[23] or Google "Cast"[24] feature), including the approximate date(s) such activity took place and who conducted or was present during such activity.

TOPIC NO. 6

The extent to which Spotify users have engaged in one or more of the following: (i) downloading the Spotify app onto a computing device (e.g., Pixel Device or other mobile phone, tablet, laptop, etc.); or (ii) operating the Spotify app to move or transfer playback of Spotify content from the computing device to a Google Media Player (e.g., by virtue of the "Spotify Connect"[25] or Google "Cast"[26] feature).

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[23] *See, e.g.*, https://developer.spotify.com/use-cases/hardware/home-audio/.
[24] *See, e.g.*, https://techcrunch.com/2015/09/29/spotify-comes-to-google-chromecast-and-chromecast-audio/.
[25] *See, e.g.*, https://developer.spotify.com/use-cases/hardware/home-audio/.
[26] *See, e.g.*, https://techcrunch.com/2015/09/29/spotify-comes-to-google-chromecast-and-chromecast-audio/.

TOPIC NO. 7

The monetary value to Spotify, in the aggregate and on a per-user basis, of the Spotify app incorporating functionality that enables a user to move or transfer playback of Spotify content from a computing device to a Google Media Player (e.g., by virtue of the "Spotify Connect"[27] or Google "Cast"[28] feature).

Dated: August 27, 2021

Respectfully submitted,

By: /s/ Cole B. Richter

Cole B. Richter (admitted *pro hac vice*)
Illinois Bar No. 6315686
LEE SULLIVAN SHEA & SMITH LLP
656 W. Randolph St., Floor 5W
Chicago, IL 60661
Telephone: 312.754.9602
Facsimile: 312.754.9603
richter@ls3ip.com

Alyssa Caridis (admitted *pro hac vice*)
California Bar No. 260103
ORRICK, HERRINGTON & SUTCLIFFE LLP
777 South Figueroa St., Suite 3200
Los Angeles, CA 90017
Telephone: 213.612.2372
Facsimile: 213.612.2499
acaridis@orrick.com

Clement Seth Roberts (admitted *pro hac vice*)
California Bar No. 209203
ORRICK, HERRINGTON & SUTCLIFFE LLP
405 Howard St.
San Francisco, CA 94105
Telephone: 415.773.5484

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[27] *See, e.g.*, https://developer.spotify.com/use-cases/hardware/home-audio/.
[28] *See, e.g.*, https://techcrunch.com/2015/09/29/spotify-comes-to-google-chromecast-and-chromecast-audio/.

Facsimile: 415.773.5759
croberts@orrick.com

Bas de Blank (admitted *pro hac vice*)
California Bar No. 191487
ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Blvd.
Menlo Park, CA 94205
Telephone: 650.614.7343
Facsimile: 650.614.7401
bdeblank@orrick.com

George I. Lee (admitted *pro hac vice*)
Illinois Bar No. 6225430
Sean M. Sullivan (admitted *pro hac vice*)
Illinois Bar No. 6230605
Rory P. Shea (admitted *pro hac vice*)
Illinois Bar No. 6290745
J. Dan Smith (admitted *pro hac vice*)
Illinois Bar No. 6300912
Cole B. Richter (admitted pro hac vice)
Illinois Bar No. 6315686
LEE SULLIVAN SHEA & SMITH LLP
656 W. Randolph St., Floor 5W
Chicago, IL 60661
Telephone: 312.754.9602
Facsimile: 312.754.9603
lee@ls3ip.com
sullivan@ls3ip.com
shea@ls3ip.com
smith@ls3ip.com
richter@ls3ip.com

Mark D. Siegmund
State Bar No. 24117055
mark@waltfairpllc.com
Law Firm of Walt, Fair PLLC.
1508 North Valley Mills Drive
Waco, Texas 76710
Telephone: (254) 772-6400
Facsimile: (254) 772-6432

Counsel for Plaintiff Sonos, Inc.